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CLERK U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
LOS ANGELES

UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

February 2012 Grand Jury

UNITED STATES OF AMERICA, ) CR No. 12- **CR12-1055**  
 )  
Plaintiff, ) I N D I C T M E N T  
 )  
v. ) [18 U.S.C. § 1341: Mail Fraud; 18  
 ) U.S.C. § 2: Causing an Act to Be  
JERRY B. GOLDMAN, ) Done]  
 )  
Defendant. )  
 )  
 )  
 )  
 )  
 )

The Grand Jury charges:

COUNTS ONE THROUGH TEN

[18 U.S.C. §§ 1341, 2]

A. INTRODUCTION

1. At all times relevant to this Indictment:

a. Defendant JERRY B. GOLDMAN ("defendant GOLDMAN")  
was a resident of Thousand Oaks, California, within the Central  
District of California.

b. Defendant GOLDMAN has been licensed to provide  
insurance brokerage services in California since 1978.

SYM:sym *sm*

1           c.    J.B. Goldman Insurance Agency, Inc., also known  
2 as J.B.G. Insurance Agency, Inc. ("Goldman Insurance Agency"),  
3 was incorporated in the State of California and operated out of  
4 2635 Lavery Court, #4, Newbury Park, California. Goldman  
5 Insurance Agency has been licensed to provide insurance  
6 brokerage services in California since 1985.

7           d.    As used in this Indictment, the term "insurance  
8 policies" refers to insurance coverage for property,  
9 automobile, personal employment practices liability, flood,  
10 excess/umbrella, fine art, earthquake, fire, multimedia  
11 liability, personal valuables, worker's compensation, and  
12 rental.

1 B. THE SCHEME TO DEFRAUD

2 2. Beginning on a date unknown but no later than in or  
3 about January 1998, and continuing through in or about August  
4 2011, within the Central District of California, and elsewhere,  
5 defendant GOLDMAN, together with others known and unknown to  
6 the Grand Jury, knowingly and with intent to defraud, devised,  
7 participated in, and executed a scheme to defraud his client-  
8 victims, including client-victims T.H., M.W.H., A.S., and S.R.,  
9 as to material matters, and to obtain money and property from  
10 his clients by means of material false and fraudulent  
11 pretenses, representations, and promises, and the concealment  
12 of material facts.

13 3. The scheme to defraud was carried out, in substance,  
14 in the following manner:

15 a. As a licensed insurance broker, defendant  
16 GOLDMAN would purchase insurance policies on behalf of his  
17 clients.

18 b. Defendant GOLDMAN would negotiate a premium for  
19 the insurance coverage and receive a commission from the  
20 insurance provider on each policy.

21 c. Defendant GOLDMAN would create a false and  
22 fraudulent invoice on J.B.G. letterhead for the premium  
23 payment, inflating the premium due as much as 600%.

24 d. Defendant GOLDMAN would mail or cause to be  
25 mailed the false and fraudulent invoices to the client for  
26 payment.

1 e. Defendant GOLDMAN would receive the payment  
2 check and deposit the check into a trust account in the name of  
3 J.B. Goldman Insurance Agency, Inc., account no. ending in  
4 2207, at California Oaks State Bank. Defendant GOLDMAN kept  
5 the difference between the actual premium due and the falsely  
6 inflated premium paid by the client.

7 f. In order to lull his clients into a false sense  
8 of security and to prevent clients from complaining to federal  
9 or state authorities or bringing a lawsuit against him, when  
10 clients asked him for copies of their insurance policies,  
11 defendant GOLDMAN sent copies of the insurance policies to the  
12 clients and redacted the true premium from the policy  
13 documentation to prevent his clients from discovering that they  
14 had been overcharged.

15 4. Between in or about January 1998, and in or about  
16 August 2011, pursuant to the fraudulent scheme described above,  
17 defendant GOLDMAN received overpayments of more than \$800,000.

18 C. USE OF MAILS

19 5. On or about the dates set forth below, in Los Angeles  
20 and Ventura Counties, within the Central District of  
21 California, and elsewhere, defendant GOLDMAN, for the purpose  
22 of executing the above-described scheme to defraud, caused the  
23 following items to be placed in an authorized depository for  
24 mail matter to be sent and delivered by the United States  
25 Postal Service or a private interstate carrier, according to  
26 the directions thereon:

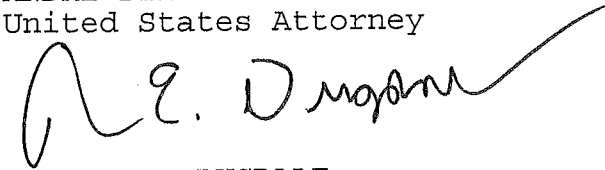
<u>COUNT</u>	<u>DATE</u>	<u>MAILING</u>
ONE	5/20/08	\$33,550 check written on behalf of client-victims T.H. and M.W.H., relating to Fireman's Fund policy number ending in 4692, and mailed to J.B.G. Insurance Agency, Inc., P.O. Box 3396, Thousand Oaks, California
TWO	9/15/08	\$14,880 check written on behalf of client-victim A.S., relating to Fireman's Fund policy number ending in 0053, and mailed to J.B.G. Insurance Agency, Inc., P.O. Box 3396, Thousand Oaks, California
THREE	5/6/09	\$15,450 check written on behalf of client-victim S.R., relating to Fireman's Fund policy number ending in 9584, and mailed to J.B.G. Insurance Agency, Inc., P.O. Box 3396, Thousand Oaks, California
FOUR	8/3/09	\$20,500 check written on behalf of client-victim S.R., relating to Fireman's Fund policy number ending in 1129, and mailed to J.B.G. Insurance Agency, Inc., P.O. Box 3396, Thousand Oaks, California
FIVE	3/22/10	\$203,000 check written on behalf of client-victims T.H. and M.W.H., relating to Praetorian Insurance Company policy number ending in 9900, and mailed to J.B.G. Insurance Agency, Inc., P.O. Box 3396, Thousand Oaks, California
SIX	7/8/10	\$36,000 check written on behalf of client-victims T.H. and M.W.H., relating to Executive Risk Indemnity, Inc. policy number ending in 9811, and mailed to J.B.G. Insurance Agency, Inc., P.O. Box 3396, Thousand Oaks, California
SEVEN	7/10/10	\$4,665 check written on behalf of client-victims T.H. and M.W.H., relating to Fireman's Fund policy number ending in 1732, and mailed to J.B.G. Insurance Agency, Inc., P.O. Box 3396, Thousand Oaks, California

<u>COUNT</u>	<u>DATE</u>	<u>MAILING</u>
EIGHT	7/26/10	\$31,775 check written on behalf of client-victims T.H. and M.W.H., relating to Fireman's Fund policy number ending in 6366, and mailed to J.B.G. Insurance Agency, Inc., P.O. Box 3396, Thousand Oaks, California
NINE	11/1/10	\$7,050 check written on behalf of client-victims T.H. and M.W.H., relating to Axis Insurance policy number ending in 2474, and mailed to J.B.G. Insurance Agency, Inc., P.O. Box 3396, Thousand Oaks, California
TEN	8/4/11	\$16,655 check written on behalf of client-victim A.S., relating to Fireman's Fund policy number ending in 0053, and mailed to J.B.G. Insurance Agency, Inc., P.O. Box 3396, Thousand Oaks, California

A TRUE BILL

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Foreperson

ANDRÉ BIROTTE JR.  
United States Attorney

  
ROBERT E. DUGDALE  
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STEPHANIE YONEKURA McCAFFREY  
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